

Counsel Listed on Signature Block

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Mater Case No.: 3:07-cv-05944-SC
MDL No. 1917
Individual Case Nos. 3:11-cv-05513-SC;
3:11-cv-06396-SC

This document relates to:

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC*

*Target Corp. v. Chunghwa, et al.,
No. 11-cv-05514-SC*

*Tech Data v. Hitachi, Ltd., et al.
No. 13-cv-00157-SC*

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE
HEARING DATE AND BRIEFING
SCHEDULE ON DEFENDANT
BEIJING MATSUSHITA COLOR CRT
CO., LTD.'S MOTION TO DISMISS
CERTAIN DIRECT ACTION
PURCHASER COMPLAINTS**

WHEREAS, on November 4, 2013, Defendant Beijing Matsushita Color CRT Co., Ltd. (“BMCC”) filed a Notice of Motion and Motion to Dismiss Certain Direct Action Purchaser Complaints (“Motion to Dismiss”) (Dkt. #2118) against certain Plaintiffs, including Best Buy Co., Inc., Best Buy Purchasing, LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, LLC, and Magnolia Hi-Fi, LLC (collectively, “Best Buy”); Target Corp. (“Target”); and Tech Data Corporation and Tech Data Product Management, Inc. (collectively, “Tech Data”);

JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE HEARING DATE AND BRIEFING
SCHEDULE ON BMCC’S MOTION TO DISMISS (Case No. 07-5944-SC; MDL No. 1917)

WHEREAS, BMCC's Motion to Dismiss is set for hearing on December 17, 2013 at 9:00 a.m. before this Court;

WHEREAS, the parties are currently considering the potential resolution of the Motion to Dismiss or a narrowing of the issues for the Court to consider;

WHEREAS, in light of the parties' ongoing discussions, BMCC, Best Buy, Target, and Tech Data have conferred and agreed to continue the hearing date and briefing schedule on BMCC's Motion to Dismiss;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between counsel to the respective parties, that, subject to the Court's approval, the hearing date on BMCC's Motion to Dismiss shall be continued to January 24, 2014 at 9:00 a.m.;

IT IS FURTHER STIPULATED AND AGREED, by and between counsel to the respective parties, that any oppositions to BMCC's Motion to Dismiss shall be filed on or before January 3, 2014, and any replies to BMCC's Motion to Dismiss shall be filed on or before January 10, 2014.

Dated: November 12, 2013

Respectfully,

By: /s/ Richard Snyder

FRESHFIELDS BRUCKHAUS DERINGER US LLP
Richard Snyder (Admitted *Pro Hac Vice*)
richard.snyder@freshfields.com
701 Pennsylvania Avenue, NW, Suite 600
Washington, DC 20004
Tel: (202) 777-4565
Fax: (202) 777-4555

Attorneys for Beijing Matsushita Color CRT Co., LTD

By: /s/ David Martinez

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
David Martinez, Bar No. 193183
dmartinez@rkmc.com
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: 310-552-0130
Facsimile: 310-229-5800

Attorneys for Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; Bestbuy.com, L.L.C.; and Magnolia Hi-Fi, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

By: /s/ Astor Heaven

CROWELL & MORING LLP

Astor Heaven (Admitted *Pro Hac Vice*)

ahaven@crowell.com

1001 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

Telephone: 202-624-2500

Facsimile: 202-628-5116

Attorneys for Plaintiff Target Corp.

By: /s/ Scott N. Wagner

**BILZIN SUMBERG BAENA PRICE & AXELROD
LLP**

Scott N. Wagner (Admitted *Pro Hac Vice*)

swagner@bilzin.com

1450 Brickell Avenue, Suite 2300

Miami, Florida 33131-3456

Telephone: 305-374-7580

Facsimile: 305-374-7593

*Attorneys for Plaintiffs Tech Data Corporation and Tech
Data Product Management, Inc.*

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.
ATTORNEYS AT LAW
LOS ANGELES

[PROPOSED ORDER]

Pursuant to stipulation of the parties, and good cause appearing, the hearing on Defendant Beijing Matsushita Color CRT Co., Ltd.'s ("BMCC") Motion to Dismiss Certain Direct Action Purchaser Complaints shall be continued from December 17, 2013 to January 24, 2014 at 10:00 a.m.

All oppositions to BMCC's Motion to Dismiss shall be filed no later than January 3, 2014.

All replies to BMCC's Motion to Dismiss shall be filed no later than January 10, 2014.

IT IS SO ORDERED.

DATED: 11/14/2013

